

ENGINEERING MANAGEMENT SUPPORT INC.

7220 West Jefferson Avenue, Suite 406
Lakewood, CO 80235

Telephone (303) 940-3426
Telecopier (303) 940-3422

February 10, 2016

VIA: Electronic Mail

U.S. Environmental Protection Agency
Region VII SUPR/MOKS
11201 Renner Boulevard
Lenexa, KS 66219

ATTENTION: Mr. Bradley Vann

SUBJECT: Monthly Status Report –January 2016
West Lake Landfill Operable Unit 1, Bridgeton, Missouri

Dear Mr. Vann,

On behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc., and the United States Department of Energy (the “Respondents”), Engineering Management Support Inc. (EMSI) submits the attached status report for the month of January 2016 as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005. If you have any questions or desire additional information related to this status report or any other aspect of the project, please do not hesitate to contact me.

Sincerely,
ENGINEERING MANAGEMENT SUPPORT, Inc.

A handwritten signature in black ink, appearing to read 'Paul V. Rosasco', with a stylized flourish at the end.

Paul V. Rosasco, P.E.

Distribution:

Lynn Juett – EPA Region 7
Ryan Seabaugh – Missouri Dept of Natural Resources
Victoria Warren – Republic Services, Inc.
Erin Fanning – Bridgeton Landfill, LLC
Russ Eggert – Lathrop & Gage
Jessie Merrigan – Lathrop & Gage
Nicholas Johnson – Lathrop & Gage
Bill Beck – Lathrop & Gage
John McGahren – Morgan Lewis
Stephanie Feingold – Morgan Lewis
Dale Guariglia – Bryan Cave HRO
Steven Miller - U. S. Department of Energy
Philip Dupre – U.S. Department of Justice
Dan Feezor – Feezor Engineering
Mike Bollenbacher – Auxier & Associates

Monthly Status Report – January 2016
West Lake Landfill Operable Unit 1
Bridgeton, Missouri

This status report has been prepared by Engineering Management Support Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC (formerly known as Laidlaw Waste Systems [Bridgeton] Inc.), Rock Road Industries, Inc., and the United States Department of Energy (the “Respondents”) for Operable Unit - 1 (OU-1) at the West Lake Landfill as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005.

1. Work Performed During January 2016

Project Planning

In a December 9, 2015 letter and attached Statement of Work, EPA directed the OU-1 Respondents to perform additional evaluations and prepare additional reports related to preparation of a Remedial Investigation (RI) Addendum and a Final Feasibility Study (FS). An abbreviated Work Plan for preparation of the RI Addendum and Final FS was submitted to EPA on December 18, 2015. EPA comments on the Work Plan were received on January 14, 2016. Revisions to the work plan to address EPA comments were prepared during this period. .

A revised work plan for performance of fate and transport evaluations was submitted to EPA and MDNR on September 4, 2014. EPA comments on the revised work plan for performance of fate and transport evaluations were received on December 19, 2014. A conference call was held with EPA on February 10, 2015 to discuss EPA comments on the revised work plan for fate and transport evaluations. A revised work plan was submitted to EPA and MDNR on August 5, 2015. We are still awaiting EPA comments on/approval of this work plan.

Based on discussions with EPA Region 7, we understand that no additional work needs to be performed relative to four of the other five work plans previously requested by EPA (the Alternative Area 2 Volume Estimate, the Partial Excavation Alternative Evaluation, the revised Present Worth Estimates, and the Alternative Landfill Cover Design) as evaluations of these items will be addressed in the Final Feasibility Study.

A draft Remedial Design Work Plan was submitted to EPA in November 2008. In accordance with direction from EPA, all work on design of the ROD-selected remedy has been put on hold.

Fieldwork - Sample Collection/Analysis

Air quality monitoring activities were performed pursuant to the EPA-approved Air Monitoring, Sampling and QA/QC Plan.

Drilling, core logging and sample collection activities associated with the Additional Characterization of Areas 1 and 2 was completed during the prior month. Logging of core samples and selection of sample intervals for laboratory analyses from the additional soil borings requested by Cotter Corporation (N.S.L.) were completed during this period. Work related to laboratory analyses of these samples and validation of analytical laboratory data occurred during this reporting period.

Report Preparation

Work related to revision of the December 2015 report of the results of the first quarter (May, June, and July 2015) of air monitoring to address EPA comments was conducted during this period.

The monthly progress report for December 2015 was prepared and submitted to EPA and MDNR on January 11, 2016.

Project Management

None.

Meetings

None.

Correspondence

The OU-1 Respondents received the following correspondence from EPA during this period:

- EPA comments on the December 18, 2015 Work Plan for the RI Addendum and Final Feasibility Study were received on January 14, 2016;
- EPA comments on the December 16, 2015 Comprehensive Phase 1 Report on January 28, 2016; and
- EPA comments on the January 4, 2016 Work Plan for the Non-Combustible Cover on January 29, 2016.

2. Analytical Data Collected During This Reporting Period

The following analytical reports were received during this period:

Air Monitoring Samples

- Air Toxics Laboratory report 1512522; and
- Eberline Laboratory report 1510102.

Area 1 and 2 Additional Characterization Samples

- Eberline Laboratory report 1512034; and
- Test America Laboratory reports 160-15213, 160-5273 and 160-5503.

Due to the size of these files, they are being transmitted separately.

3. Work Scheduled to Be Performed during February and March 2016

The following activities are expected to be performed during the upcoming two months:

- Preparation and submittal of a revised Work Plan for the RI Addendum and Final FS in response to EPA comments;
- Preparation of a revised Comprehensive Phase 1 report in response to EPA comments;
- Continuation of air monitoring activities in accordance with the EPA-approved Air Monitoring, Sampling and QA/QC Plan;
- Review and validation of the laboratory data from the air monitoring program;
- Continuation of the laboratory analyses associated with the Additional Characterization of Areas 1 and 2;
- Review and validation of the laboratory data from the Additional Characterization of Areas 1 and 2;
- Performance of laboratory testing to support the fate and transport evaluations;
- Work in furtherance of the preparation of an RI Addendum report for submittal later this year;

- Evaluation of apatite treatment technologies; and
- Continued work on verifying and assembling historic site data into a form suitable for loading into EQuIS.

In addition to the above items, during February the following activities related to the Non-Combustible Cover are also expected to be conducted:

- Preparation of a revised Work Plan for Installation of a Non-Combustible Cover in response to EPA comments; and
- Initiation of activities related to overland gamma scanning, vegetation clearing, installation of the non-combustible cover and collection of verification samples as described in the Work Plan for Installation of a Non-Combustible Cover.

Note that upon EPA approval of the Work Plan for Installation of a Non-Combustible Cover, discussions of actions completed and anticipated work related to this task will be presented in a separate progress report as specified in the Unilateral Administrative Order for Removal Action – Non Combustible Cover.

4. Problems Encountered

None.

Laboratory Analytical Reports

(transmitted separately)